

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Joint Administration Requested)

**Hearing Date: July 1, 2022 at 10:00 a.m. (EST)**

**Related Docket Nos. 20 and 22**

## **NOTICE OF HEARING ON POSTPETITION FINANCING MOTIONS**

**PLEASE TAKE NOTICE** that on June 30, 2022, the above-captioned debtors and debtors in possession (the “Debtors”) filed the *Debtor’s Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Operational Cash Flow Financing; (II) Authorizing the Debtors to Use Cash Collateral; (III) Granting Liens and Superpriority Administrative Expense Status; (IV) Granting Adequate Protection; (V) Modifying the Automatic Stay; (VI) Scheduling a Final Hearing; and (VII) Granting Related Relief* [Docket No. 22] (the “Cash Flow DIP Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”)

**PLEASE TAKE FURTHER NOTICE** that on June 30, 2022, the Debtors also filed the *Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Enter into Repurchase Agreement Facilities; (II) Authorizing the Debtors to Sell and Repurchase Mortgage Loans in the Ordinary Course of Business; (III) Granting Liens and Providing Superpriority Administrative Expense Status; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing*

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5400 Tennyson Parkway, Suite 450, Plano, TX 75024.

*with Respect to the Relief Requested Herein; and (VI) Granting Related Relief* [Docket No. 20] (the “DIP Repo Motion”, together with the Cash Flow DIP Motion, the “DIP Motions”) with the Court.

**PLEASE TAKE FURTHER NOTICE** that the Debtors attached to the Cash Flow DIP Motion the proposed *Interim Order (I) Authorizing the Debtors to Enter into Repurchase Agreement Facilities; (II) Authorizing the Debtors to Sell and Repurchase Mortgage Loans in the Ordinary Course of Business; (III) Granting Liens and Providing Superpriority Administrative Expense Status; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing with Respect to the Relief Requested Herein; and (VI) Granting Related Relief* (the “Proposed Interim Cash Flow DIP Order”). A copy of the Proposed Interim Cash Flow DIP Order is attached hereto as **Exhibit A**.

**PLEASE TAKE FURTHER NOTICE** that the Debtors attached to the DIP Repo Motion the proposed *Interim Order Pursuant to 11 U.S.C §§ 105, 361, 362, 363, 364, 503, 507, 546, 548, 555, 556, 559, 560 and 561 (I) Authorizing the Debtors to Enter Into Repurchase Agreement Facilities and Related Documents; (II) Authorizing Debtors to Sell and Repurchase Mortgage Loans in the Ordinary Course of Business; (III) Granting Liens and Providing Superpriority Administrative Expense Status; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing with Respect to the Relief Requested Herein; and (VI) Granting Related Relief* (the “Proposed DIP Repo Interim Order”, together with the Proposed Interim Cash Flow DIP Order, the “Proposed Interim DIP Orders”). A copy of the Proposed DIP Repo Interim Order is attached hereto as **Exhibit B**.

**PLEASE TAKE FURTHER NOTICE** that the Debtors intend to seek interim approval of the DIP Motions and entry of the Proposed Interim Orders in substantially the form attached hereto at a hearing (the “Interim Hearing”) before the Honorable Craig T. Goldblatt at the United States Bankruptcy Court for the District of Delaware (the “Court”), located at 824 North Market Street, 3<sup>rd</sup> Floor, Courtroom No. 7, Wilmington, Delaware 19801, on July 1, 2022, at 10:00

a.m. (Eastern time). Copies of the DIP Motions may be obtained for free at [www.kccllc.net/FGMC](http://www.kccllc.net/FGMC) or for a fee through the Court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov), referencing Case No. 22-10584 (CTG).

**PLEASE TAKE FURTHER NOTICE** that after the Interim Hearing, the Debtors will serve upon you a complete copy of (a) the DIP Motions, (b) any Interim Orders entered by the Court at the Interim Hearing, and (c) notice of the final hearing on the DIP Motions.

**PLEASE TAKE FURTHER NOTICE** that the Debtors reserve the right to modify, if necessary, the Proposed Interim Orders before or at the Interim Hearing.

Dated: June 30, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)  
919 North Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, Delaware 19899 (Courier 19801)  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
Email: [ljones@pszjlaw.com](mailto:ljones@pszjlaw.com)

-and -

**DENTONS US LLP**

Samuel R. Maizel  
Tania M. Moyron  
601 S. Figueroa Street #2500  
Los Angeles, CA 90017  
Telephone: (213) 623-9300  
Email: [samuel.maizel@dentons.com](mailto:samuel.maizel@dentons.com)  
[tania.moyron@dentons.com](mailto:tania.moyron@dentons.com)

-and-

**DENTONS US LLP**

David F. Cook  
1900 K Street, NW  
Washington, DC 20006  
Telephone: (202) 496-7500  
Email: [david.f.cook@dentons.com](mailto:david.f.cook@dentons.com)

*Proposed Counsel for Debtors and Debtors in Possession*